

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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ARTURO LARACUENTE GONZALEZ
RAMONA DEL C. RAMOS FLORES
DEBTOR (S)

CASE NO. 08-03377-BKT

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CHAPTER 13

BANCO POPULAR DE PUERTO RICO
MOVANT (S)

*

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Vs.

ARTURO LARACUENTE GONZALEZ
RAMONA DEL C. RAMOS FLORES
ALEJANDRO OLIVERAS, TRUSTEE

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**DEBTORS' RESPONSE TO MOTION REQUESTING RELIEF
FROM THE AUTOMATIC STAY**

TO THE HONORABLE COURT:

NOW COME debtors through the undersigned attorney, and very respectfully state and pray as follow:

1. Banco Popular de Puerto Rico filed a Motion requesting relief from the automatic stay basically alleging that debtors are in arrears in their post-petition payments with said creditor.

2. On September 23, 2010, the debtors filed a Post-Confirmation Modification of Chapter 13 Plan, docket **56**. This Post-Confirmation Modification of Chapter 13 Plan is filed to provide for payments to Banco Popular de Puerto Rico, therefore, curing any and all arrears with said creditor.

WHEREFORE, debtors request this Honorable Court to deny the Motion for relief from stay filed by Banco Popular de Puerto Rico, in the above captioned case.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; Attorney for Movant, Cardona Jimenez Law Offices, PSC; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors, Arturo Laracuate Gonzalez and Ramona Del C. Ramos Flores.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of September, 2010.

/s/ Roberto Figueroa Carrasquillo

ROBERTO FIGUEROA CARRASQUILLO

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